



**Seyfarth Shaw LLP**  
975 F Street N.W  
Washington D.C. 20004  
**T** (202) 463-2400  
**F** (202) 828-5393

tlocke@seyfarth.com  
T (202) 828-5376

www.seyfarth.com

January 29, 2021

**VIA FEDERAL EXPRESS**

William T. Walsh, Clerk of the Court  
United States District Court  
Clarkson S. Fisher Building & US Courthouse  
402 East State Street  
Trenton, NY 08608

**In re: Johnson & Johnson Talcum Powder Products Marketing, Sales  
Practices, and Products Liability Litigation, MDL No. 2738**

Dear Mr. Walsh:

By this letter, Defendant Personal Care Products Council (“PCPC”), with the consent of the Plaintiff’s counsel Fears Nachawati Law Firm PLLC, respectfully requests that, pursuant to Case Management Order No. 10 [Dkt. No. 4767] entered on February 22, 2018 (“CMO 10”), the Clerk of the Court enter dismissals without prejudice of PCPC only as a defendant in each lawsuit listed on Exhibit A.

PCPC is an improper party in the 3,247 lawsuits identified in Exhibit A, as those lawsuits are not set for remand in the U.S. District Court for the District of New Jersey *or* the U.S. District Court for the District of Columbia. Exhibit A provides each individual party’s name, case title, and docket number. Case Management Order No. 10 [Dkt. No. 4767] (“CMO 10”), the court held, in pertinent part:

each and every civil action (other than those amended through the process described above) that has been either designated in Paragraph 10 of the Short Form Complaint for remand to a U.S. District Court other than the U.S. District Court for the District of New Jersey or the U.S. District Court for the District of Columbia and/or transferred to this Court for coordinated or consolidated pretrial proceedings from a U.S. District Court other than the U.S. District Court for the District of New Jersey or the U.S. District Court for the District of Columbia is hereby DISMISSED as to Defendant PCPC only.



Thank you for your attention to this matter.

Very truly yours,

SEYFARTH SHAW LLP

A handwritten signature in blue ink that reads 'Thomas T. Locke'. The signature is fluid and cursive, written over the printed name.

Thomas T. Locke

cc: ***By email*** (with enclosure)

The Honorable Freda L. Wolfson  
Patrick Luff, Esq., Fears Nachawati Law Firm PLLC  
Plaintiff's Steering Committee  
Counsel for Defendants Johnson & Johnson